

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ZOND, LLC,

Plaintiff,

v.

ADVANCED MICRO DEVICES, INC. and
GLOBALFOUNDRIES U.S., INC.,
GLOBALFOUNDRIES DRESDEN
MODULE ONE LLC & CO. KG, and
GLOBALFOUNDRIES DRESDEN
MODULE TWO LLC & CO. KG,

Defendants.

CIVIL ACTION NO. 13-cv-11577-DPW

JURY TRIAL DEMANDED

**DEFENDANTS ADVANCED MICRO DEVICES, INC., GLOBALFOUNDRIES
U.S., INC., GLOBALFOUNDRIES DRESDEN MODULE ONE LLC & CO. KG,
AND GLOBALFOUNDRIES DRESDEN MODULE TWO LLC & CO. KG'S
UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF
MOTION TO STAY CASE**

Pursuant to Local Rule 7.1(b)(3), Advanced Micro Devices, Inc. (“AMD”), GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES Dresden Module One LLC & Co. KG, and GLOBALFOUNDRIES Dresden Module Two LLC & Co. KG (collectively, “GLOBALFOUNDRIES”) move for leave to file a reply memorandum in support of AMD’s and GLOBALFOUNDRIES’ Motion to Stay Case (Dkt. 59). Plaintiff Zond, Inc. (“Zond”) does not oppose this Motion for Leave to File a Reply. The proposed reply memorandum and its accompanying exhibit are attached hereto as Exhibits 1 and 2, respectively.

This reply memorandum is necessary in order for AMD and GLOBALFOUNDRIES to address new arguments and issues raised in Zond’s opposition to the AMD and GLOBALFOUNDRIES Motion to Stay (Dkt. 63), including to clarify the operative legal standards and to address new factual arguments raised in the opposition brief. AMD and GLOBALFOUNDRIES believe that this reply will help to crystalize the various issues and arguments, and will assist the Court in ruling on their motion.

WHEREFORE, AMD and GLOBALFOUNDRIES respectfully request that this Court grant this motion for leave to file the attached reply memorandum.

Dated: May 29, 2014

Respectfully submitted,

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**Attorneys for Defendant Advanced Micro
Devices, Inc.**

CERTIFICATE OF CONSULTATION

I, Paul J. Cronin, hereby certify that in accordance with Local Rule 7.1(a)(2), counsel for Defendants Advanced Micro Devices, Inc., GLOBALFOUNDRIES U.S., Inc., GLOBALFOUNDRIES Dresden Module One LLC & Co. KG, and GLOBALFOUNDRIES Dresden Module Two LLC & Co. KG and counsel for Plaintiff Zond, Inc. met and conferred in good faith regarding resolution of this motion. I certify further that counsel for Zond, Inc. indicated that it will not oppose this Motion for Leave to File a Reply.

By: /s/ Paul J. Cronin
Paul J. Cronin

CERTIFICATE OF SERVICE

I, Paul J. Cronin, hereby certify that a true copy of the above document was served upon counsel of record for the plaintiff through the Court's electronic court filing (ECF) system, this 29th day of May, 2014.

By: /s/ Paul J. Cronin
Paul J. Cronin

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